

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division

GOLDEN BETHUNE-HILL, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	
VIRGINIA STATE BOARD OF	)	Civil Action No. 3:14-cv-00852-REP-AWA-
ELECTIONS, et al.,	)	BMK
	)	
Defendants,	)	
and	)	
	)	
VIRGINIA HOUSE OF DELEGATES,	)	
et al.,	)	
	)	
Intervenor-Defendants.	)	

**DEFENDANTS' RESPONSE TO PLAINTIFFS' SUPPLEMENTAL SUBMISSION  
REGARDING MOTION FOR ATTORNEYS' FEES AND LITIGATION EXPENSES**

Pursuant to the Court's Orders dated April 20, 2020 (Dkt. 423), and May 5, 2020 (Dkt. 425), defendants have no further response to plaintiffs' Supplemental Submission Regarding Revised Second Motion for Attorneys' Fees and Litigation Expenses (Dkt. 426). As noted in defendants' Response to Plaintiffs' Revised Second Motion for Attorneys' Fees and Litigation Expenses (Dkt. 405), defendants respectfully request that the amount awarded against defendants should be no more than \$3,265,879.86 in total for fees, expenses, and costs.

Dated: May 22, 2020

Respectfully submitted,

By: /s/ Jessica Merry Samuels  
Jessica Merry Samuels, VSB # 89537  
Assistant Solicitor General  
Office of the Attorney General  
202 North Ninth Street  
Richmond, Virginia 23219  
(804) 786-7240 – Telephone  
(804) 371-0200 – Facsimile  
solicitorgeneral@oag.state.va.us

Mark R. Herring  
Attorney General

Toby J. Heytens  
Solicitor General

**CERTIFICATE OF SERVICE**

I hereby certify that on May 22, 2020, a true and accurate copy of this paper was filed electronically with the Court's CM/ECF system, which will then send a notification of such filing to the counsel of record in this case.

By: */s/ Jessica Merry Samuels*  
Jessica Merry Samuels